

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
GWG Holdings, Inc., <i>et al.</i> , ¹)	Case No. 22-90032 (MI)
)	
Debtors.)	(Jointly Administered)
)	
)	

**STIPULATION AND AGREED ORDER RESETTING (I) HEARING ON EMPLOYEE
MOTION AND (II) FINAL HEARING ON CASH MANAGEMENT MOTION**

GWG Holdings, Inc. (“GWGH”) and certain of its subsidiaries, as debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), and the Official Bondholders’ Committee (the “Committee”) and the DIP Lenders² (and together with the Debtors, the “Parties”) hereby enter into this stipulation and order (this “Stipulation and Agreed Order”) as follows:

Recitals

WHEREAS, on April 20, 2022 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (the “Court”);

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ claims and noticing agent: <https://donlinrecano.com/gwg>.

² Capitalized terms used but not otherwise defined in this Stipulation and Agreed Order shall have the meanings given to them in the Interim DIP Order.

WHEREAS, on April 20, 2022, the Debtors filed their *Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief* [Docket No. 4] (the “Employee Motion”);

WHEREAS, on April 20, 2022, the Debtors filed their *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and Maintain Existing Bank Accounts, (B) Maintain Existing Business Forms and Books and Records, and (C) Continue to Perform Intercompany Transactions and (II) Granting Related Relief* [Docket No. 8] (the “CM Motion”);

WHEREAS, on April 23, 2022, the Court entered the *Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and Maintain Existing Bank Accounts, (B) Maintain Existing Business Forms and Books and Records, and (C) Continue to Perform Intercompany Transactions and (II) Granting Related Relief* [Docket No. 102] (the “Interim CM Order”);

WHEREAS, a hearing on the Employee Motion and a final hearing on the CM Motion were originally scheduled for May 23, 2022 at 1:30 p.m. (CT) [Docket No. 146]; and

WHEREAS, the Parties have agreed to reset the hearings with the permission of the Court.

NOW, THEREFORE, in consideration of the foregoing recitals, which are incorporated into this Stipulation and Agreed Order, the Parties hereby stipulate and agree as follows:

1. The hearing on the Employee Motion and the final hearing on the CM Motion are hereby reset to June 16, 2022 at 2:00 p.m. (CT) (which hearings may be further reset or adjourned with the consent of the Court).

2. The Committee's deadline to object to the Employee Motion and CM Motion is hereby extended to June 9, 2022 at 4:00 p.m., prevailing Central Time.

3. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

4. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Houston, Texas

Dated: _____, 2022

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

/s/ Kristhy M. Peguero

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